

**KNIGHT FIRST AMENDMENT INSTITUTE v. CDC and HHS,**

**Case Number 1:20-cv-02761-AT**

***Vaughn Index of Withheld Documents***

Item	Release ID	Description	Withheld Information	Basis for Withholding
1.	First release	Proposed changes to draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 1-21)	Proposed changes to draft CDC Communications and Media Strategy for COVID-19	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
2.	Final Production, Part 1	08/31/2017 NCIRD Senior Mgmt email chain (pages 47-48)	Discussion about tentative CDC media communication clearance policy	Deliberative process privilege: open, frank discussions on matters of policy between staff members
3.	Final Production, Part 1	08/31/2017 NCIRD Senior Mgmt email chain (pages 49-50)	Discussion about tentative CDC media communication clearance policy	Deliberative process privilege: open, frank discussions on matters of policy between staff members
4.	Final Production, Part 1	08/31/ -- 09/01/2017 NCIRD Senior Mgmt email chain (pages 51-53)	Discussion about possible changes in CDC media communication clearance policy	Deliberative process privilege: open, frank discussions on matters of policy between staff members
5.	Final Production, Part 1	09/13/2017 Kristen Nordlund email to NCIRD Senior Mgmt about meeting with Office of the Associate Director for Communication (OADC) Mgmt (pages 58-59)	Tentative clearance process for reactive media requests	Deliberative process privilege: open, frank discussions on matters of policy between staff members
6.	Final Production, Part 1	09/14/2017 NCHS Senior Mgmt email chain (pages 73-74)	Follow-up discussion about tentative CDC media communication clearance policy	Deliberative process privilege: open, frank discussions on matters of policy between staff members
7.	Final Production, Part 1	09/08/2017 NCHS Senior Mgmt email chain (pages 82-83)	Follow-up discussion about tentative CDC media communication clearance policy	Deliberative process privilege: open, frank discussions on matters of policy between staff members
8.	Final Production, Part 1	09/08/2017 NCHS Senior Mgmt email chain (pages 84-85)	Follow-up discussion about tentative CDC media communication clearance policy	Deliberative process privilege: open, frank discussions on matters of policy between staff members
9.	Final Production, Part 2	02/25/2020 EOP email to Senior Government Officials (pages 33-34)	Proposed coordinated media communication strategy for COVID-19 with designated speakers for various issues/topics	Presidential communications privilege. Communications with the President or his immediate advisors.

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10.	Final Production, Part 2	02/25 -- 02/27/2020 EOP email chain to Senior Government Officials (pages 35-36)	Update and elaboration of proposed coordinated media communication strategy for COVID-19	Presidential communications privilege. Communications with the President or his immediate advisors.
11.	Final Production, Part 2	02/26/2020 CDC OD email forwarding 02/25/2020 EOP email to Senior Government Officials (pages 38-39)	Proposed coordinated media communication strategy for COVID-19 with designated speakers for various issues/topics	Presidential communications privilege. Communications with the President or his immediate advisors.
12.	Final Production, Part 2	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 41-58)	Plan to provide timely, accurate, relevant, and actionable information for the public, healthcare providers, first responders, border officials, policymakers, media, and the public health community.	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
13.	Final Production, Part 3	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 3-16)	OADC edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
14.	Final Production, Part 3	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 18-33)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions</p>

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				offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.
15.	Final Production, Part 3	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 35-50)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
16.	Final Production, Part 3	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 52-74)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
17.	Final Production, Part 3	02/25/2020 EOP email to Senior Government Officials (pages 75-76) DUPLICATE OF PART 2, PAGES 33-34	DUPLICATE OF PART 2, PAGES 33-34	DUPLICATE OF PART 2, PAGES 33-34
18.	Final Production, Part 3	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 79-94)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how</p>

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				the agency should communicate information regarding the coronavirus.
19.	Final Production, Part 3	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 97-112)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
20.	Final Production, Part 4	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 3-19)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
21.	Final Production, Part 4	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 49-62)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
22.	Final Production, Part 4	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 67-82)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a

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				<p>particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
23.	Final Production, Part 4	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 90-106)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
24.	Final Production, Part 5	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 4-28)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
25.	Final Production, Part 5	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 34-62)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by</p>

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				revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.
26.	Final Production, Part 5	02/25/2020 EOP email to Senior Government Officials (pages 64-65) DUPLICATE OF PART 2, PAGES 33-34	DUPLICATE OF PART 2, PAGES 33-34	DUPLICATE OF PART 2, PAGES 33-34
27.	Final Production, Part 5	02/25 – 02/26/2020 Division of Global Migration and Quarantine email chain (pages 66-67)	Discussion of how to apply 02/25/2020 EOP email to Senior Government Officials	Deliberative process privilege: open, frank discussions on matters of policy between staff members
28.	Final Production, Part 5	02/25 – 02/26/2020 Division of Global Migration and Quarantine email chain (page 63)	Discussion of how to apply 02/25/2020 EOP email to Senior Government Officials	Deliberative process privilege: open, frank discussions on matters of policy between staff members
29.	Final Production, Part 5	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 73-93)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.  Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.
30.	Final Production, Part 5	03/13/2020 email chain between NCIRD and OADC (pages 96 -99)	Proposed edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.
31.	Final Production, Part 6	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 10-24)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.  Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by

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				revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.
32.	Final Production, Part 6	Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response (pages 28-44)	Edits to Draft CDC Communication and Media Strategy for the Coronavirus Disease 2019 Response	<p>Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted. Release could cause harm by providing the public with erroneous information on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p> <p>Deliberative process privilege: open, frank discussions on matters of policy between staff members. Release could cause harm by revealing the exchange of ideas, language choices, and opinions offered by agency leadership on a particularly sensitive matter: how the agency should communicate information regarding the coronavirus.</p>
33.	Final Production, Part 6	05/11 –05/15/2020 HHS/ASPA email chain (pages 45-47)	Interim clearance process for HHS and EOP	Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted
34.	Final Production, Part 6	05/22/2020 HHS/ASPA email (pages 93-94)	Interim media clearance process for HHS	Deliberative process privilege: protect against premature disclosure of proposed policies before they are actually adopted
35.	Final Production, Part 6	04/30/2020 CDC/OD email to CDC/OADC (pages 111-113)	Interim communication and media procedures	Deliberative process privilege and presidential communications privilege: protect against premature disclosure of proposed policies before they are actually adopted, including references to communications with the President or his immediate advisors.